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CHILDREN, INC.

24 PERIMETER CENTER EAST

SUITE 2400

ATLANTA, GEORGIA 30346

770 • 391-1511

1 800 • 522-2913

FAX 770 • 391-1566

www.hopeforchildren.org

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Dear Hague Representatives:

Thank you for all of your incredible hard work in preparing regulations to protect the children of the world. You have worked very hard to ensure quality services to the children and families who are involved in international adoption.

I deeply appreciate the appropriate quality control standards, since I believe this is very important to providing excellent services. Also, I appreciate the fact that your standards include families receiving timely and meaningful disclosures about fees, procedures and their child's medical well-being. This is an extremely important part of your work. In addition, I'm glad to see that the families involved in the adoption process have official recourse when problems arise. Someone needs to be defending the children and the families. Your role is extremely important.

I have one suggested change in 96.37. It currently reads as follows:

Education and experience requirements for social service personnel.

- a) The agency or person uses employees with appropriate qualifications and credentials perform, in connection with a convention adoption – related social service functions that require application of clinical skills and judgment (home studies, child background studies, counseling, parent preparation, post placement, and other similar services).
- b) The agencies or persons employees meet any state licensing or regulatory requirements for the services they are provided.
- c) The agencies or persons, executive director, the supervisor overseeing a case, or the social services employee providing adoption related social services that require the application of clinical skills and judgment (home studies, child background studies, counseling, parent preparation, post placement, and other similar services) have experience in the professional delivery of intercountry adoptions.
- d) Supervisors. The agencies or persons social work supervisors have prior experience in family and children services, adoption, or intercountry adoption and either:
 1. A Master's Degree from an Accredited program of social work education;
 2. A Master's Degree (or doctorate) in a related human service field, including but not limited to, psychology, psychiatry, psychiatric nursing, counseling, rehabilitation counseling, or pastoral counseling; or

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3. In the case of a social work supervisor who is or was an incumbent at the time of the convention enters into the force for the United States, the supervisor has significant skills and experience in intercountry adoption and has regular access to consultation (to an individual with the qualifications listed in paragraph (d.1) or paragraph (d.2) of this section
- e) Non-supervisory employees. The agencies or persons non supervisory employees providing adoption related social services that require application of clinical skills and judgment other than home studies or child background studies.
 1. Have a Master's Degree from an Accredited program of social work education or another human services field, or
 2. Have a Bachelor's Degree from an Accredited program of social work; a combination of a Bachelor's Degree in another human services field and prior experience in family and children services, adoption, or intercountry adoption; or a Bachelor's Degree in any field and extensive experience in intercountry adoption. Additionally, the non-supervisory employees are supervised by an employee of the Accredited agency or approved person who meets the requirements for supervisors in paragraph (d) of this section.
- f) Home Studies. The agencies or persons employee who conducts home studies:
 1. Have a minimum of a Master's Degree from an Accredited program of social work education or Master's Degree (or Doctorate) in a related human service field including but not limited to, psychology, psychiatric, psychiatric nursing, counseling, rehabilitation counseling, or pastoral counseling;
 2. Are authorized to complete home studies under the law of the state of the child's proposed residence; and
 3. Meet the INA requirements for home study preparers in 8CFR204-3(b) covering home studies in convention cases.
- g) Child Background Studies. The agencies or persons employee who prepare child background studies have a minimum of a Master's Degree in an Accredited program of social work education or a Master's Degree (or Doctorate) in a related human service field including but not limited to, psychology, psychiatric, psychiatric nursing, counseling, rehabilitation counseling, or pastoral counseling.

I deeply appreciate the high standards that the Hague Regulations are holding for those who prepare home studies. However, I believe having an MSW is only one way to ensure quality home studies. I suggest that caseworkers who have at least four years of experience be able to qualify by showing examples of their work, documenting extensive training, taking a test to prove they are qualified to do international home studies, and absolutely be supervised by an MSW who is a licensed clinical social worker. I also suggest that in order to qualify a person who may have the experience that a quality control questionnaire be given to the adoptive parents who have received children to ascertain how well the home study preparer prepared them for adoption.

I have employed people with their MSW as well as people without a degree to do home studies. Often I have seen the ones without a degree are more competent to train and teach during a home study than an MSW who simply asks the questions. The key is the life experience of the worker, the commitment to training and the attitude and heart to continue to learn from their supervisor.

Therefore, I would like to change section (f.1) to read as follows:

- f. Home Studies. The agencies or persons employee who conducts home studies:
 - 1. Have a minimum of a Master's Degree from an Accredited program of social work education or Master's Degree (or Doctorate) in a related human service field including but not limited to, psychology, psychiatric, psychiatric nursing, counseling, rehabilitation counseling, or pastoral counseling. Or, at least four years of experience under the supervision of a licensed clinical social worker with at least 100 hours of documented training in the field of adoption and social work and at least 20 documented quality control questionnaires from adoptive parents who have completed adoptions under the caseworker's home study supervision which demonstrate the skill to train and prepare adoptive families for international adoption.

Again, thank you for your incredible hard work and concern for families and children. I hope these comments are helpful as you make final changes in the Hague Regulations.

If you have any questions, please feel free to contact me.

Sincerely for children and families,



Kent Brand, MSW, ACSW, LCSW
Director of Social Services
Executive Director
HOPE for Children, Inc.
24 Perimeter Center East
Suite 2400
Atlanta, GA 30346

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